


LABOR COMPLIANCE PROGRAM ANNUAL REPORT

Format for Approved Program that contracts with Awarding Bodies to provide labor compliance enforcement

Report for the reporting period 4/1/2010 to 6/30/2010
(mm/dd/yyyy) (mm/dd/yyyy)

1. Name of Labor Compliance Program (LCP) : Advocates for Labor Compliance, LLC		
2. LCP I.D. Number (assigned by DIR): 2003.00079	3. Date of Initial Approval: 4/9/2003	
4. Contact person (include name, title, address, telephone, fax, and e-mail, if available): <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Mark Griffith, Executive Vice President 1906 S. Commercenter East, Suite 211 San Bernardino, CA 92408 </div> <div style="width: 45%;"> T: 909-890-2220 F: 909-890-3660 E: MGRIFFITH@A4LC.COM </div> </div>		
5. List all Awarding Bodies covered by this report as well as any other Awarding Bodies with whom the LCP currently has a contract to provide compliance enforcement. If <i>none</i> , please proceed directly to item 7 and provide all requested information. Then complete the information below, and sign and submit this form to DIR, Office of the Director, Attn: LCP Special Assistant 455 Golden Gate Avenue, 10 th Floor, San Francisco, CA 94102. Colton Joint Unified School District, Corona-Norco Unified School District, Irvine Unified School District, Montebello Unified School District, San Bernardino County Superintendent of Schools, and Wasco Union High School District		
What suggestions do you have for the Department of Industrial Relations to better assist you with your program in the coming year? (attach additional sheets if necessary): 		
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> SUBMITTED BY:  _____ Signature </div> <div style="width: 30%; text-align: center;"> Mark Griffith Executive V.P. _____ Name and Title </div> <div style="width: 30%; text-align: right;"> <div style="font-size: 1.5em; font-family: cursive;">10/25/10</div> _____ Date </div> </div>		

6. LC § 1771.5 enforcement activities (provide all information requested, attaching as many sheets as necessary, and please complete separate forms for each Awarding Body covered in this report).

Awarding Body: Colton Joint Unified School District

A. List projects handled by LCP within the past 12 months between 4/1/2010 thru 6/30/10. Supplemental Report to Interim Report.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Bloomington HS Math & Science Bldg	4/19/10	CW Driver	\$14,000,000.00
Total			\$14,000,000.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
Bloomington HS	Avery Enterprises	\$579.48	\$579.48	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Underpayment of Overtime
Bloomington HS	MDE Group	\$2,760.78	\$2,760.78	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Underpayment of Wages
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total		\$3,340.26	\$3,340.26		

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
Bloomington HS	\$579.48	\$579.48	Contractor agreed with findings and paid restitution.
Bloomington HS	\$2,760.78	\$2,760.78	Contractor agreed with findings and paid restitution.
Total	\$3,340.26	\$3,340.26	

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

6. LC § 1771.5 enforcement activities (provide all information requested, attaching as many sheets as necessary, and *please complete separate forms for each Awarding Body covered in this report*).

Awarding Body: Corona-Norco Unified School District

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Abatement at Coronita ES, Lincoln ES & Vicentia ES	3/22/10	Neff Construction/Multi Prime	\$8,884,023.00
Parkridge School for the Arts New 2-Story Modular Building	3/22/10	Silver-Creek Industries	\$5,474,683.00
Dr. Augustine Ramirez Intermediate School	2/5/10	Neff Construction/Multi Prime	\$20,996,945.00
Total			\$35,355,651.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
Coronita, Lincoln & Vicentia	Knudsen Grading	\$2,453.87	\$2,453.87	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Underpayment of Wages
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total		\$2,453.87	\$2,453.87		

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
Coronita, Lincoln & Vicentia	\$2,453.87	\$2,453.87	Contractor agreed with findings and paid restitution.
Total	\$2,453.87	\$2,453.87	

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

6. LC § 1771.5 enforcement activities (provide all information requested, attaching as many sheets as necessary, and *please complete separate forms for each Awarding Body covered in this report*).

Awarding Body: Montebello Unified School District

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Monterey Park ES & Macy Intermediate School Demolition of Portable Classrooms	10/15/09	Oak Tree Environmental	\$86,700.00
Total			\$86,700.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
Monterey Park & Macy IS	Oak Tree Environmental	\$704.64	\$704.64	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Underpayment of wages & CAC
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total		\$704.64	\$704.64		

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
Monterey Park & Macy IS	\$704.64	\$704.64	Contractor agreed with findings and paid restitution.
Total			

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☒ Yes ☐ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____ Oak Tree Environmental

6. LC § 1771.5 enforcement activities (provide all information requested, attaching as many sheets as necessary, and *please complete separate forms for each*

LCP-AR3*Awarding Body covered in this report).*Awarding Body: Irvine Unified School District

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Canyon View ES Small Classroom Expansion	3/14/10	JW Builders Construction	\$250,000.00
Deerfield Expansion	4/25/10	CW Driver	\$5,414,217.00
Lakeside MS Re-Roof	5/23/10	Best Contracting	\$500,000.00
Oak Creek ES	3/14/10	Tek-Up Construction	\$338,000.00
PA-40 Middle School	4/25/10	CW Driver	\$20,415,000.00
Plaza Vista K-8	3/14/10	Malcon Civils, Inc	\$389,000.00
Woodbridge HS Music & Fitness Center	4/11/10	CW Driver	\$6,975,757.00
Total			\$38,243,629.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
Canyon View ES	JW Builders Construction	\$9,352.75	\$0.00	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Underpayment of Wages & OT
PA-40 Middle School	Empyrean Plumbing	\$4,750.00	\$0.00	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Non-submission of Payroll Report
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total		\$14,102.75			

6. LC § 1771.5 enforcement activities (provide all information requested, attaching as many sheets as necessary, and *please complete separate forms for each Awarding*

Body covered in this report).

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
Canyon View ES	\$9,352.75	\$0.00	Currently waiting for response and back-up from contractor regarding findings.
PA-40 Middle School	\$4,750.00	\$0.00	Currently waiting for response and/or Certified Payroll Reports.
Total	\$14,102.75		

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☒ Yes ☐ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: JW Builders Construction

LCP-AR3Awarding Body: San Bernardino County Schools of Superintendents

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Del Norte Elementary School	4/9/10	Paul Miller Construction	\$808,329.00
North Shore Elementary School	4/15/10	Paul Miller Construction	\$1,092,085.00
Chino High School Special Education Building	6/17/10	Paul Miller Construction	\$721,885.00
Total			\$2,622,299.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
N/A				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total					

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
N/A			
Total			

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

LCP-AR3Awarding Body: Wasco Union High School District

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Wasco High School Cafeteria	4/1/10	Colombo Construction	\$6,091,000.00
Total			

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
N/A				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total					

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
N/A			
Total			

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

Awarding Body: Monrovia Unified School District

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Monrovia HS	11/4/09	Tilden-Coil/MultiPrime	\$18,485,766.00
Total			\$18,485,766.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
Monrovia HS	All Star Sports Equipment, Inc	\$66,398.50	\$0.00	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Underpayment of Wages
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total					

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
Monrovia HS	\$66,398.50	\$0.00	Pending approval from labor commissioner.
Total			

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Monrovia HS	\$0.00	\$11,700.00	\$75.00	\$54,061.30	\$66,398.50				\$0.00	
Total					N/A					N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

Awarding Body: Redlands Unified School District

A. List projects handled by LCP within the past 12 months.

Project Name	Bid Advertisement Date	Prime Contractor	Contract Amount
Citrus Valley HS	2/28/07	Ran Enterprises	\$1,480,000.00
Citrus Valley HS	2/28/07	Steel Stadiums	\$1,070,000.00
Total			\$2,550,000.00

B. Summary of all wages and penalties assessed and/or recovered.

Project Name	Affected Contractor (who directly employed the worker)	Amount Assessed	Amount Recovered	Approval of Forfeiture Requested from Labor Commissioner?	Description of Violation
Citrus Valley HS	APEX Construction	\$55,946.16	\$0.00	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Underpayment of Wages & OT
Citrus Valley HS	All Star Sports Equipment	\$112,764.59	\$0.00	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Underpayment of Wages & OT
				<input type="checkbox"/> Yes <input type="checkbox"/> No	
Total		\$168,710.75	\$0.00		

C. For any amount identified in item B for which approval of forfeiture not requested from the Labor Commissioner, please explain below.

Project Name	Amount Assessed	Amount Recovered	Explanation
Citrus Valley HS	\$55,946.16	\$0.00	Pending contractor's response and back-up.
Citrus Valley HS	\$112,764.59	\$0.00	Pending approval from labor commissioner.
Total			

D. For any amount identified in item B for which approval of forfeiture was requested from the Labor Commissioner, please provide the following:

Project Name	Amount Assessed					Amount Recovered				
	LC §1776(g)	LC § 1775	LC § 1813	Wages	Total	LC § 1776(g)	LC § 1775	LC § 1813	Wages	Total
Citrus Valley HS	\$0.00	\$14,900.00	\$1,350.00	\$96,201.31	\$112,764.59					
Total										N/A

E. Identify cases that are or were the subject of LC § 1742 proceedings.

Project Name	Contractor	Nature of Violation	ODL Case #	Current Status
N/A				

F. Did you refer any contractor to the Labor Commissioner for debarment per LC § 1777.1?

Please check one: ☐ Yes ☒ No

If yes, identify affected contractor(s) or subcontractor(s) and date(s) of referral: _____

G. Did you refer any apprenticeship violation to the Division of Apprenticeship Standards (DAS)?

Please check one: ☐ Yes ☒ No

7. On a separate sheet, provide a certificate of compliance with conflict of interest disclosure requirements by employees and consultants who participate in making governmental decisions (as defined under 2 CCR § 18701) along with the names of LCP personnel who are filing disclosure statements and the agencies with which those statements are being filed.

8. Please update the following information per 8 CCR § 16426(a)(2), (3) and (5) disclosure requirement.

A. Identify the geographical areas in which the program intends to operate and the identity of any public agencies not previously identified in this report with which the program intends to contract to provide labor compliance enforcement.

Statewide

B. State whether the entity shares personnel, management, ownership or other close affiliation with any of the following: (1) any contractor or subcontractor that within the preceding five years has been awarded a public works contract within the geographical area in which the program operates or intends to operate or with any public agency with which the program has contracted or intends to contract to provide labor compliance enforcement; (2) any person or entity who has been the surety on such a contract; (3) any joint labor-management committee established pursuant to the Federal Labor Management Cooperation Act of 1978 (section 175a of Title 29 of the United States Code); or (4) any person or entity who has represented workers employed in the same or similar classifications as those employed for such a contract and who has been engaged in (i) an organizational campaign under the National Labor Relations Act with contractors competing for such contracts or (ii) a jurisdictional dispute with another collective bargaining representative of workers utilized for such contracts.

For each affiliation, please provide the name, address, telephone number, and principal contact person for the person or entity; please identify shared personnel, management, and ownership; and if applicable, please provide a short description of the nature and extent of any other close affiliation:

C. Identify the attorney or law firm available to provide legal support for the LCP, and whether the persons or firms providing that support also represent any contractor, subcontractor, surety, or worker representative referred to in the preceding item.

Attorney/Law Firm Name (include address, contact person, and telephone number)

Certification of Compliance and Disclosure Information

A) Conflict of Interest:

Pursuant to 8 CCR § 16431(a)(5), I hereby certify under penalty of perjury, that ALC nor any of its personnel or private contractors have any undisclosed investment, interest in real property, sources of income or business position that would adversely affect any decision in the capacity of a third-party LCP provider, as defined in the Fair Political Practices Act and any and all regulations promulgated for its enforcement.

COVERAGE: ALC intends to provide services and operate statewide. All agencies have been reported on in this report, or will be reported on in subsequent reports.

B) Disclosures:

Pursuant to 8 CCR § 16426 (a)(2,3 & 5) I hereby certify under penalty of perjury, that - (2) ALC intends to operate as a third party provider for Labor Compliance Services throughout the State of California for any School District or Agency that wishes to contract our services and/or is required to do so pursuant to OPSC guidelines.

(3) ALC does not share personnel, management, ownership or affiliation with: (A) any contractor or subcontractor performing work on public works construction; (B) Any person or entity that has been a surety on such a contract; (C) Any Union Work Preservation or Labor-Management Committee, or; (D) Any person or entity who has represented workers engaged in an organizing campaign or a jurisdictional collective bargaining dispute.

(5) ALC retains competent legal counsel for our own approved program that, to our knowledge does not represent contractors, subcontractors, surety or worker representative affiliates.

ALC is instructed to utilize the services of independent District and Agency counsel, should the need arise. ALC's listed counsel is:

COLLINS, COLLINS, MUIR & STEWART, LLP
1100 El Centro Street | PO Box 250
South Pasadena, CA 91030

Sincerely,



Mark L. Griffith, LCO
Executive Vice President

10/25/10
DATE